UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHARLES J. GEDMAN and : CHAPTER 13

GEORGIANNE GEDMAN

Debtors

:

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant

VS.

:

CHARLES J. GEDMAN and

GEORGIANNE GEDMAN

Respondents : CASE NO. 5-22-bk-00188

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 14th day of March, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' plan for the following reason(s):

- 1. Debtors' plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtors have not submitted all or such portion of the disposable income to the Trustee as required. More specifically, the plan payment is less than the debtors' disposable income as shown on Schedule J.
- 2. Debtors' plan violates 11 U.S.C. § 1322(b)(1) in that the plan classifies unsecured claims but unfairly discriminates certain claims in the designation. More specifically, the plan provides for payment of:
 - a. Student loan

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036

CERTIFICATE OF SERVICE

AND NOW, this 16th day of March, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Eugene Doud, Esquire 1418 Main Street, Suite 102 Peckville, PA 18452

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee